

1 ALVERSON, TAYLOR,
2 MORTENSEN & SANDERS
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13 *Attorney for Defendant,*
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15 *& Associates, PC*

11 **UNITED STATES DISTRICT COURT**
12
13 **DISTRICT OF NEVADA**

14 SHEILA KEMP,

15 Plaintiff,

16 v.

17 LAW OFFICSE OF GERALD E. MOORE
18 & ASSOCIATES, PC,

19 Defendant.

Case No.: 2:17-cv-02788-JAD-CWH

**MOTION FOR EXTENSION OF TIME
TO FILE RESPONSE TO PLAINTIFF'S
MOTION FOR LEAVE AMEND THE
COMPLAINT TO ADD ADDITIONAL
PARTIES**

20 Defendant Law Offices of Gerald E. Moore & Associates, PC ("Defendant"), by and
21 through its attorney of record, Alverson, Taylor, Mortensen & Sanders, moves pursuant to Rule
22 6(b) of the Federal Rules of Civil Procedure for a fourteen (14) day extension of time, through
23 and including May 9, 2018, to respond to Plaintiff's Motion for Leave Amend the Complaint to
24 Add Additional Parties. In support of its motion, Defendant states:
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1 1. On April 11, 2018, Plaintiff filed her motion for leave to amend the complaint
2 to add additional parties. (Dkt. 10).

3 2. The deadline for Defendant to file its response in opposition to Plaintiff's
4 motion is April 25, 2018.

5 3. Despite diligent efforts to meet the aforementioned filing deadline, defense
6 counsel requires additional time to meaningfully confer with Defendant, complete Defendant's
7 response and obtain client input and approval prior to filing.

8 4. Accordingly, good cause exists to extend Defendant's response in opposition to
9 Plaintiff's motion for leave by fourteen (14) days through and including May 9, 2018.

10 5. Defendant's request has not been made to stall, delay or otherwise thwart the
11 order progression of this case.

12 6. Defense counsel has requested concurrence from Plaintiff's counsel regarding
13 the relief requested in this motion but has not yet heard back.

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1 WHEREFORE, Defendant Law Offices of Gerald E. Moore & Associates, PC
2 respectfully requests that this Court grant it a fourteen (14) day extension of time, through and
3 including May 9, 2018, in which to file its response in opposition to Plaintiff's Motion for
4 Leave Amend the Complaint to Add Additional Parties.
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6 DATED this 25 day of April, 2018

7 ALVERSON, TAYLOR,
8 MORTENSON, & SANDERS

9 
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18 efile@alversontaylor.com

19 Attorney for Defendant,

20 Law Offices of Gerald E. Moore

21 & Associates, PC

22 IT IS SO ORDERED.

23 DATED: April 26, 2018

24 
C.W. HOFFMAN, JR.

25 UNITED STATES MAGISTRATE JUDGE

26 **CERTIFICATE OF SERVICE VIA CM/ECF**

27 I hereby certify that on this 25 day of April, 2018, I did serve, via Case
28 Management/Electronic Case Filing, a copy of the above and foregoing **MOTION FOR
EXTENSION OF TIME TO FILE RESPONSE TO PLAINTIFF'S MOTION FOR
LEAVE AMEND THE COMPLAINT TO ADD ADDITIONAL PARTIES** addressed to:

29 
An Employee of ALVERSON, TAYLOR,
MORTENSEN & SANDERS

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